

**REMARKS**

Claims 1-25 remain pending in the application.

**Claims 1, 12 and 13 over Gutzmer**

In the Office Action, claims 1, 12 and 13 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Gutzmer, U.S. Patent No. 4,907,267 ("Gutzmer") with claim 13 further allegedly obvious over Gutzmer in view of well known prior art ("WKPA"). The Applicants respectfully traverse the rejection.

Claims 1, 12 and 13 recite, *inter alia*, an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone.

Gutzmer appears to disclose an apparatus for connecting a telecommunications device, such as a computer or facsimile machine modem to a telephone line via a telephone set (Abstract). The device converts a telephone base handset jack into a telephone line connection (Gutzmer, col. 3, lines 12-14). Accordingly, the device permits the coupling of any telephone line compatible device, i.e., modem, facsimile machines, speaker phones, etc. (Gutzmer, col. 3, lines 14-17).

Gutzmer discloses an apparatus and method of connecting any device that conventionally connects to a wall outlet to a telephone base handset jack for convenience. Each of the items connected to the telephone base handset jack are independent devices, i.e., are not designed to add function to the telephone base. Although Gutzmer discloses a speakerphone connected to a telephone base handset jack, the speakerphone does not add functionality to the telephone base. The telephone base is not used other than to provide access to a telephone line.

Applicants claim an apparatus to adapt a common telephone for operation as a speakerphone. None of the devices disclosed by Gutzmer adapt the telephone base to have additional functionality. The telephone base is not acting as a speakerphone, the speakerphone connected to the telephone base is

acting as a speakerphone, just as the facsimile machine connected to the telephone base acts as a facsimile and does not adapt the telephone base to act as a facsimile. Gutzmer fails to disclose an audio module to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone, as recited by claims 1, 12 and 13.

WKPA is relied on to teach a telephone line interface (Office Action, page 9). Gutzmer discloses a telephone line interface 32 (Gutzmer, Fig. 1, item 20).

Neither Gutzmer nor WKPA, either alone or in combination, disclose, teach or suggest an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone, as recited by claims 1, 12 and 13.

A benefit of adapting a common telephone into a speakerphone is, e.g., reduced circuitry equating to reduced costs with portability. Gutzmer connects a fully functional speakerphone, i.e., one that can be connected to a wall outlet, to a handset jack of a base telephone. A common telephone has the majority of functions that a speaker phone has sans the speakerphone function. Adapting a common telephone to perform speakerphone functions requires little change to the common telephone. A device that adapts a common telephone to have speakerphone capability would only have to add the circuitry to perform the new speakerphone function, relying on the common telephone to perform dialing and connection functions. Adding circuitry for speakerphone capability to a common telephone while relying on the common speakerphone for the remainder of telephony functions is a low cost alternative to buying a completely new telephone with speakerphone capability built in. Moreover, as the device adapts a common telephone, the added device could be portably attached to various common telephones that a user would like to add speakerphone capability to.

Accordingly, for at least all the above reasons, claims 1, 12 and 13 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 2, 3, 16 and 18-20 over Gutzmer in view of Acree**

In the Office Action, claims 2, 3, 16 and 18-20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gutzmer in view of Acree, U.S. Patent No. 5,099,514 (“Acree”). The Applicants respectfully traverse the rejection.

Claims 2 and 3 are dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claims 2 and 3 recite, *inter alia*, an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone. Claims 16 and 18-20 recite, *inter alia*, temporarily connecting a loudspeaker and a microphone to a handset connection on a base to convert a common telephone into a speakerphone.

As discussed above, Gutzmer discloses connecting a speakerphone to a handset jack of a telephone base. The speakerphone does not change the function of the telephone base, as it is using the telephone base simply as a convenient way of connecting to a telephone line. The speakerphone is acting as a speakerphone, **NOT adapting** the telephone base to perform a speakerphone function. Gutzmer fails to disclose or suggest adapting and converting a common telephone for operation and into a speakerphone, as recited by claims 2, 3, 16 and 18-20.

The Office Action relies on Acree to allegedly make up for the deficiencies in Gutzmer to arrive at the claimed invention. The Applicants respectfully disagree.

Acree appears to disclose a multi-purpose telephone accessory unit for persons who use a telephone for extended periods of time (Abstract). The telephone accessory unit has a headset, an AC/DC transformer, and a housing (Acree, col. 3, lines 31-32). A telephone line is connected to the housing unit at a telephone line interface (Acree, col. 3, lines 53-56). A headset unit including a mouth piece microphone is used to communicate with the telephone line (Acree, col. 3, lines 46-52). Alternately, the housing unit contains an internal

microphone for communication with the telephone line (Acree, col. 3, lines 42-45).

Acree discloses a multi-purpose telephone accessory unit that replaces a telephone. The multi-purpose telephone accessory unit is convenient because it includes a headset for extended use. The headset allows its wearer to hear a telephone conversation and is not comprised of a loudspeaker. Acree's multi-purpose accessory unit **does not** include a loudspeaker for it to operate as a speakerphone, as recited by claims 2, 3, 16 and 18-20.

Neither Gutzmer nor Acree, either alone or in combination, disclose, teach or suggest adapting and converting a common telephone for operation and into a speakerphone, as recited by claims 2, 3, 16 and 18-20.

Accordingly, for at least all the above reasons, claims 2, 3, 16 and 18-20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 4, 5 and 7-11 over Gutzmer in view of Arbel**

In the Office Action, claims 4, 5 and 7-11 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gutzmer in view of Arbel, U.S. Patent No. 4,912,758 ("Arbel"). The Applicants respectfully traverse the rejection.

Claims 4, 5 and 7-11 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 4, 5 and 7-11 recite, *inter alia*, an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone.

As discussed above, Gutzmer fails to disclose adapting a common telephone for operation as a speakerphone, as recited by claims 4, 5 and 7-11.

The Office Action relies on Arbel to allegedly make up for the deficiencies in Gutzmer to arrive at the claimed invention. The Applicants respectfully disagree.

Arbel appears to disclose a full-duplex digital speakerphone that includes a room echo cancellation adaptive filter and a trunk echo cancellation adaptive filter (Abstract). The speakerphone eliminates error signals related to either A-Law or Mu-Law quantization and linearity errors (Arbel, col. 2, lines 32-35).

Arbel discloses eliminating problems associated with full-duplex digital speakerphones. Arbel fails to disclose a common telephone, much less adapting a common telephone for operation as a speakerphone utilizing a loudspeaker, as recited by claims 4, 5 and 7-11.

Neither Gutzmer nor Arbel, either alone or in combination, disclose, teach or suggest an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone, as recited by claims 4, 5 and 7-11.

Accordingly, for at least all the above reasons, claims 4, 5 and 7-11 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 14, 17, 18, 21 and 22 over Gutzmer in view of Papadopoulos**

In the Office Action, claims 14, 17, 18, 21 and 22 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gutzmer in view of Papadopoulos, U.S. Patent No. 5,623,544 ("Papadopoulos"). The Applicants respectfully traverse the rejection.

Claims 14, 17, 18, 21 and 22 are dependent on claims 1, 16 and 20 respectively, and are allowable for at least the same reasons as claims 1, 16 and 20.

Claim 14 recites, *inter alia*, an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common telephone for operation as a speakerphone through a loudspeaker and a microphone. Claims 17, 18, 21 and 22 recite, *inter alia*, temporarily connecting a loudspeaker and a microphone to a handset connection on a base to convert a common telephone into a speakerphone.

As discussed above, Gutzmer fails to disclose converting and adapting a common telephone for operation as a speakerphone, as recited by claims 14, 17, 18, 21 and 22.

The Office Action relies on Papadopoulos to allegedly make up for the deficiencies in Gutzmer to arrive at the claimed invention. The Applicants respectfully disagree.

Papadopoulos appears to disclose a telephone headset interface circuit that is coupled to a telephone line to extract power for use by a headset amplifier (Abstract). A switch provides compatibility of the telephone headset interface circuit with telephones of various types (Papadopoulos, col. 10, lines 44-47).

Papadopoulos fails to even mention a speakerphone. Papadopoulos fails to disclose, teach or suggest converting and adapting a common telephone for operation as a speakerphone, as recited by claims 14, 17, 18, 21 and 22.

Neither Gutzmer nor Papadopoulos, either alone or in combination, disclose, teach or suggest converting and adapting a common telephone for operation as a speakerphone utilizing a loudspeaker, as recited by claims 14, 17, 18, 21 and 22.

Accordingly, for at least all the above reasons, claims 14, 17, 18, 21 and 22 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 15, 24 and 25 over Gutzmer in view of McDuffee**

In the Office Action, claims 15, 24 and 25 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gutzmer in view of McDuffee, U.S. Patent No. 6,002,945 ("McDuffee"). The Applicants respectfully traverse the rejection.

Claims 15, 24 and 25 are dependent on claims 1 and 20 respectively, and are allowable for at least the same reasons as claims 1 and 20.

Claim 15 recites, *inter alia*, an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt a common

telephone for operation as a speakerphone through a loudspeaker and a microphone. Claims 24 and 25 recite, *inter alia*, temporarily connecting a loudspeaker and a microphone to a handset connection on a base to convert a common telephone into a speakerphone.

As discussed above, Gutzmer fails to disclose converting and adapting a common telephone for operation as a speakerphone, as recited by claims 15, 24 and 25.

McDuffee appears to teach a radio frequency two-way electronic communications device incorporating features of both a mobile pager and a cellular phone (Abstract).

McDuffee fails to even mention a speakerphone.

Neither Gutzmer nor McDuffee, either alone or in combination, disclose, teach or suggest converting and adapting a common telephone for operation as a speakerphone, as recited by claims 15, 24 and 25.

Accordingly, for at least all the above reasons, claims 15, 24 and 25 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'William H. Bollman', written over a horizontal line.

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